

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
MICHAEL J. JONES JR.,

Plaintiff,

v.

BETH ISRAEL HOSPITAL,

Defendant.

Case No. 1:17-cv-03445-GHW

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the declaration of Robert L. Isabella, Esq., dated November 14, 2017, the exhibits annexed thereto, the accompanying memorandum of law, and all other papers and proceedings in this action, defendant BETH ISRAEL MEDICAL CENTER s/h/a BETH ISRAEL HOSPITAL, by its undersigned counsel, will move this Court, before the Honorable Gregory H. Woods, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, and if required, oral argument will be held on a date and time to be determined by the Court, for an Order dismissing Plaintiff's Complaint in its entirety, with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and awarding this defendant such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Order of October 31, 2017, the time for the plaintiff to respond to this motion is **December 15, 2017** and the defendant shall reply by **December 22, 2017**.

Dated: New York, New York  
November 14, 2017



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TO: MICHAEL J. JONES, JR.  
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Plaintiff *Pro Se*

Via Registered, Certified and Return Receipt Requested